

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

<b>In Re:</b>	)	<b>19-27857</b>
	)	
<b>Anita Allen,</b>	)	<b>Chapter 13</b>
	)	
<b>Debtor(s).</b>	)	<b>Hon. Judge Jacqueline P. Cox</b>

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on February 1, 2021, at 9:00 a.m., I will appear before the Honorable Judge Jacqueline P. Cox, or any judge sitting in Judge Cox's place, and present Debtor's Motion to Incur Debt, a copy of which is attached.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video,** (1) use this link: <https://www.zoomgov.com>. (2) Enter the meeting ID 1612732896. (3) Enter the passcode 778135.

**To appear by telephone,** (1) call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. (2) Enter the meeting ID 1612732896. (3) Enter the passcode 778135.

**WHEN PROMPTED IDENTIFY YOURSELF BY STATING YOUR FULL NAME.**

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Movant: Anita Allen  
By: Michael R. Colter, II  
David M. Siegel & Assoc., LLC  
790 Chaddick Drive  
Wheeling, IL 60090  
847-520-8100 mcolter@davidmsiegel.com

**CERTIFICATE OF SERVICE**

I, Michael R. Colter, II, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on January 15, 2021, before 5:30 p.m.

*To the following persons or entities who have been served via electronic mail:*

U.S. Bankruptcy Trustee  
Chapter 13 Trustee, Tom Vaughn

*To the following persons or entities who have been served via U.S. Mail:*

Anita Allen  
P.O. Box 598  
Lansing, IL 60438

Wells Fargo Bank  
P.O. Box 10438, NAC F8235-02F  
Des Moines, IA 50306

Prestige Financial  
P.O. Box 26707  
Salt Lake City, UT 84126

Citibank  
5800 S. Corporate Place  
Sioux Falls, SD 57108-5027

Tidewater Finance Co.  
P.O. Box 13306  
Chesapeake, VA 23325

Bridgecrest Credit Co.  
P.O. Box 29018  
Phoenix, AZ 85038

City of Chicago Dept. Of Finance  
c/o Arnold Scott Harris  
111 W. Jackson Blvd. Ste. 600  
Chicago, IL 60604

Fair Square Financial  
Resurgent Capital Services  
P.O. Box 10368  
Greenville, SC 29603

Navy Federal Credit Union  
Bankruptcy Department  
820 Follin Lane  
Vienna, VA 22180

NPRTO Illinois  
256 West Data Drive  
Draper, UT 84020

Capital One Bank  
4515 N. Santa Fe Ave.  
Oklahoma City, OK 73118

Quantum3 Group  
Genesis FS Card  
P.O. Box 788  
Kirkland, WA 98083

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

IN RE:	)	19-27857
	)	
Anita Allen,	)	Chapter 13
	)	
Debtor(s).	)	Hon. Judge Jacqueline P. Cox

**MOTION TO INCUR DEBT**

NOW COMES the Debtor, Anita Allen, by and through her attorney, DAVID M. SIEGEL & ASSOC., LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction under 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois.
- 2) On October 1, 2019, the Debtor filed for relief under Chapter 13 of Title 11 USC.
- 3) Debtor's Plan was confirmed January 6, 2020, with monthly payments of \$475.00, and general unsecured creditors receiving no less than 10% of their allowed claims.
- 4) The Debtor's confirmed plan included a 2014 Nissan Murano which Debtor paid through her Plan. The confirmed plan also surrendered a 2016 Jeep Patriot.
- 5) The Debtor's Nissan Murano was stolen and totaled late in 2020.
- 6) The Debtor seeks permission to incur debt and finance the purchase of a vehicle to replace the stolen Nissan Murano. The Debtor seeks permission to finance the purchase of a 2019 Nissan Sentra with 32,430 miles.
- 7) The terms of financing for the Nissan Sentra are \$357.00 per month for 72 months at an interest rate of 19.95% (Exhibit A).
- 8) The Debtor obtained three estimates. The Nissan Sentra is the best deal. The 2019 Dodge Caravan has 49,023 miles with a monthly payment of \$401.00 for 72 months at an interest rate of 17.95% (Exhibit B).

- 9) The third estimate for a 2017 Hyundai Tucson with 32,514 miles requires a monthly payment of \$474.02 for 72 months at an interest rate of 22.72% (Exhibit C).

WHEREFORE, the Debtor, Anita Allen, prays this Honorable Court enter an Order Granting Debtor's Motion to Incur Debt and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II

Michael R. Colter, II, A.R.D.C. #6304675